

Defendants Illinois Appellate Court Justices Hyman, Taylor, Walker; current and former Cook County Circuit Court Judges Jackson, Barrett, and Kubalanza; Illinois Supreme Court Clerk Cynthia A. Grant; Illinois Appellate Court Lead Deputy Clerk Mollakarimi; and current and former Cook County official court reporters Wiewiora-Kerns and Saviano (collectively, “State Defendants”), by their attorney, Kwame Raoul, Attorney General of Illinois, respectfully move this Court for a 7-day extension of time, to April 15, 2025, to file their reply in support of their motion to dismiss. In support of this motion, State Defendants state as follows:

2. State Defendants' motion to dismiss reply brief is due Tuesday, April 8, 2025. Dkt. 102.

3. Undersigned counsel has been working diligently on State Defendants' reply brief. However, due to the length and complexity of Plaintiff's 41-page single-spaced response brief, and the time needed for internal review, the State Defendants require an additional 7 days to finalize their motion to dismiss reply brief.

4. As such, the State Defendants request an additional 7 days, to April 15, 2025 to file their motion to dismiss reply brief.¹

WHEREFORE, the State Defendants respectfully request that this Court grant their motion and extend State Defendants' deadline to file their reply in support of their motion to dismiss by 7 days to April 15, 2025.

Respectfully submitted,

/s/ Marci L. Sahinoglu
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¹ Over the weekend, on April 6, 2025, Plaintiff submitted three filings: Dkt. 111, "Plaintiff's Motion to Submit Reply Memorandum in Opposition to Defendants' Motions to Dismiss" with an exhibit, Dkt. 111-1, which is itself another motion titled "Plaintiff's Motion for Leave to File Brief in Excess of Page Limit Instantly" in which Plaintiff seeks leave to file a 73-page "reply" in opposition to defendants' motions to dismiss. That 73-page page reply is filed separately at Dkt. 112. State Defendants oppose both motions, and will address those in a separate filing. The Federal Rules of Civil Procedure do not permit a litigant to file both a response and a reply brief. Further, it is unclear whether Plaintiff intends for her 73-page "reply" brief (Dkt 112) to replace her earlier-filed 41-page response brief (Dkt. 100). It appears however, that Plaintiff raises new arguments for the first time in this 73-page reply brief. If the Court is inclined to allow these filings to stand as part of Plaintiff's response to the motions to dismiss, State Defendants' will need additional time, beyond the time requested herein, to respond to the new arguments Plaintiff raises in her "reply" brief.